

Mr S. McPartland
Member of Parliament for Stevenage
House of Commons
London
SW1A 0AA



27th November 2012

Dear Mr McPartland

Thank you for your letter of 19th November concerning corporate tax. The first fact for you to know is that, in 2011, the Aggreko group's effective corporation tax rate for the year was 28.5% which you will immediately recognize as being 4.5 percentage points above the UK standard rate of 24%. I think that should be evidence enough for you that we are not indulging in what you call "tax dodging". You may also be interested to know that, whilst only 5% of our revenues arise in the UK, 10% of our employees work here; 20% of our payroll costs are in the UK, and 30% of our corporate taxes are paid to HMRC. We go significantly above and beyond the statutory requirements in disclosing where our corporate taxes are paid, and I would refer you to pages 41 and 42 of our 2011 Annual Report for further details.

We believe, therefore, that we are on the side of the angels as far as corporate tax transparency is concerned. However, I think the idea of forcing companies to provide "financial information on a country by country basis, including the names of all companies belonging to it and trading in each country, its financial performance in each country and tax liability in each country" is a lousy idea and would be unworkable for a company such as ours which trades in over 100 countries. We are already facing an uphill battle to keep our Annual Reports useful to and readable by investors; including the information you ask for would be completely impractical. We would also be extremely reluctant to let our competitors, or our customers, see our trading accounts in every country in which we do business.

I am sorry if this answer is not what you wanted to hear, but I hope I will get some Brownie points for having taken the time to answer your letter fully.

Yours sincerely

Rupert Soames, OBE
Chief Executive

Aggreko plc
8th Floor, Aurora
120 Bothwell Street
Glasgow G2 7JS

Mr Stephen McPartland MP
House of Commons
London
SW1A 0AA

28 November 2012



Dear Mr McPartland,

Re: Tax Justice Bus Tour

Thank you for your letter of 19 November 2012 concerning tax transparency.

As you know, there is significant debate on-going in relation to corporate tax transparency and there are a number of initiatives in this area including the Extractive Industries Transparency Initiative, the Dodd-Frank Wall Street Reform and Consumer Protection Act, proposals for EU Directives on Transparency and Accounting, Publish What You Pay and Country-by-Country reporting proposals for all multinational companies.

AMEC will participate in the consultations around the proposals and will comply with any rules laid down. Given the number of proposals and differing views our preference would be that any new standards or rules are consistently implemented on a global basis.

We understand our obligations as a UK company and continue to comply with all rules and regulations, consistent with our core value of always acting with integrity.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Samir Brikho".

Samir Brikho



AngloAmerican

CORPORATE OFFICE

GOVERNMENT AND SOCIAL AFFAIRS

20 Carlton House Terrace
London
SW1Y 5AN
United Kingdom

Mr. Stephen McPartland
Member of Parliament for Stevenage
House of Commons
London
SW1A 0AA



7th December 2012

Dear Mr. McPartland,

Thank you for your letter of 19 November. I am replying as head of Government Relations at Anglo American.

You ask whether we support corporate tax transparency. The answer is yes. We have made voluntary disclosures of our payments to governments for the last 9 years (I enclose copies of the relevant pages from last year's sustainable development report). We are also founder members of the Extractive Industry Transparency Initiative (EITI) which as you may know is based on a three-way auditing process involving business, government and civil society.

With regard to proposals for new, more detailed standards, we are involved in discussions around the EU's current draft Transparency Directive which is under negotiation in the European Institutions and believe it is appropriate to await the outcome of that process.

Yours Sincerely

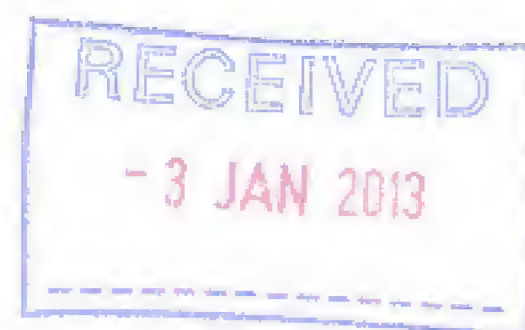
Hugh Elliott
Head of Government Relations

www.angloamerican.com

A member of the Anglo American plc group

Anglo American plc
Registered Address: 20 Carlton House Terrace, London, SW1Y 5AN, United Kingdom
Incorporated in England and Wales. Registration Number: 3564138

Pascal Soriot
Chief Executive Officer



AstraZeneca



Mr Stephen McPartland MP
House of Commons
London
SW1A 0AA

20th December 2012

Dear Mr McPartland

Thank you for your letter of 19th November. I certainly appreciate your effort to raise awareness and understanding of the needs of developing countries and the obligations on us all to support efforts to reduce global poverty.

I acknowledge the role MNC's need to play in meeting their obligations to act as good corporate citizens in all the countries in which they operate, especially those that lack the infrastructure and resources to develop and enforce appropriate legal and regulatory frameworks. An important element of good corporate behaviour is paying the right amount tax in each country in which MNC's operate.

At AstraZeneca we have a clear commitment to corporate and social responsibility through promotion of ethical conduct, for example through compulsory training and on-line self certification. I hold every one of my staff personally accountable to behave responsibly in all given business situations. This includes dealings with developing countries and in particular ensuring all appropriate taxes are paid that fairly reflect our business operations in those countries.

As a global business, managing the payment of appropriate taxes around the world is a significant concern for the company and our Group Head of Tax participates in fora promoting good tax administration including HMRC's Business Tax Forum (BTF), its international tax subcommittee and its legislative process committee. The BTF includes representatives from large business, HMRC, HM Treasury and BIS with a remit to design effective administration of taxes in the UK as well as contribute to the development of robust international frameworks for the administration of taxes around the world.

AstraZeneca also supports effective initiatives to advance the wealth and well being of developing nations, particularly in terms of healthcare. Our Young Health Program, which targets 11 – 19 year olds, seeks to better understand the health needs of this group and how best to help them stay in education and become productive members of society. Our goal is to touch 1 million young people in more than 15 countries by 2014. AstraZeneca also contributes to major disaster relief efforts in partnership with the International Red Cross including making direct cash donations and the provision of medicines when appropriate.

Tax transparency

AstraZeneca supports the need for appropriate disclosure and tax transparency in its dealings with all tax authorities. To this end we:

- (i) provide all relevant financial and tax information required by tax authorities;
- (ii) pay all taxes due in the countries in which we operate;
- (iii) engage openly in dialogue on tax policy development and tax administration in many of the countries in which we operate; and
- (iv) publish an explicit statement in our Annual Report that our tax advisory work is focused on supporting genuine business transactions and we do not indulge in purely artificial tax planning.

Notwithstanding these actions, we acknowledge that tax administrations in developing countries may lack resources to effectively collect taxes and enforce tax law. To address these deficiencies, we support OECD's and others' efforts to build capacity around tax policy and administration in the developing world.

AstraZeneca around the world

As you will be aware the traditional markets for ethical pharmaceuticals are developed countries such as North America, Japan, Australia and South East Asia and Europe. In AstraZeneca, these countries account for over 90% of our sales reflecting their advanced healthcare infrastructures and ability to pay for innovative medicines. These markets also account for over 90% of our people and intellectual property-generating resources upon which our industry depends. Historically, AstraZeneca has focused on the areas of highest unmet medical need such as heart disease, cancer, gastrointestinal and respiratory conditions.

More recently, we have expanded our operations to meet patient needs in emerging markets such as China, India, Russia and Brazil. As a result, the poorest nations do not contribute significantly to our operational footprint and financial results in terms of intellectual property, sales, profits or local resources.

We do, of course, play a role in providing access to medicines for particular developing country health issues such as infection, heart disease and oncology. We also conduct research in disease areas most affecting developing countries for example our TB research in India. I consider these initiatives to be important contributions to supporting development in these countries in addition to paying appropriate taxes.

Country by Country (C by C) reporting

As explained above, AstraZeneca discloses all relevant financial and tax information to tax authorities where we operate.

I would make three key points in relation to this proposal in the context of the goal of reducing poverty:

First, the financial attributes of local operations reflect only part of the contribution that MNC's make in developing countries. There are other social, environmental and economic aspects including donations, access to medicines and other taxes (duties, sales taxes, payroll taxes, withholding taxes etc) that are equally important in assessing the total contribution made.

Second, as explained above, our pharmaceutical business is very limited in developing countries. Therefore the added transparency would simply demonstrate that the sales, profits - and therefore taxes - are very small compared to developed markets.

Finally, the level of resource and cost involved in producing and auditing the required information would in my view be disproportionate to the additional information gained in support of reducing poverty. In our case the process would simply tell the tax authorities in developed countries what they already know or have an ability to find out in short order.

For these key reasons I question whether a blanket requirement for all companies to identify all the financial attributes you list would be the best way to establish a stable corporate tax base for developing nations and contribute to reducing poverty. I would favour an approach that takes into account a threshold of materiality and, for relevant businesses, a range of measures including: social and environmental dimensions as well as financial.

Conclusion

I reiterate my unreserved support for the goal of reducing poverty in developing countries and the work of Christian Aid and other NGO's to that end as well as transparency of tax arrangements to tax authorities in countries where MNC's operate. However, I do not see the C by C proposal as making a meaningful difference particularly for MNC's like AstraZeneca where we have very limited activity in such countries. For those with material interests in developing nations, I could envisage a broader range of social, environment and economic measures including one that takes into account all taxes are paid.

If you require any further clarification on the comments above, please do not hesitate to contact me.

Yours sincerely,



Pascal Soriot



Aviva plc St Helen's 1 Undershaft London EC3 3DQ

Stephen McPartland MP
House of Commons
London
SW1A 0AA

Mark Wilson
Chief Executive Officer

16 January 2013

RECEIVED

21 JAN 2013

Dear Mr McPartland,

Re: Tax Justice Bus Tour

Thank you for your letter date 19 November 2012.

In addition to the comments made in The Hundred Group's response of 17 December 2012, which, as a member, we fully support, we have the following comments:

Corporate tax transparency

The Aviva Group fully supports corporate tax transparency. This is demonstrated in the following ways:

- 1) The Aviva Group Annual Report and Accounts complies with International Financial Reporting Standards ("IFRSs") as issued by the International Accounting Standards Board. In terms of corporate tax disclosures, our accounts meet the detailed disclosure requirements set out in IAS 12 – Income Taxes. All numbers and disclosures in the accounts are subject to independent review by the Group's auditors.
- 2) The Aviva Group complies with all tax filing, payment and disclosure requirements in each of the countries in which it operates.
- 3) The Aviva Group deals transparently with all tax authorities in the countries in which it operates and provides them with full relevant information.

New international accountancy standard

Aviva would comply with any new International Accounting Standard that may be issued and would welcome the opportunity to contribute to a consultation on any additional disclosure requirements.

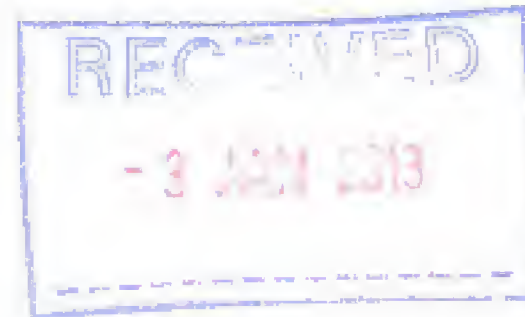
Aviva also supports the Hundred Group's comments that the tax gap issue identified by Christian Aid may be better addressed by helping developing countries to build up their administrative capabilities within their tax collection regimes.

Yours sincerely

Mark Wilson

18 December 2012

Mr Stephen McPartland MP
House of Commons
London
SW1A 0AA



Dear Mr McPartland

Re: Tax Justice Bus Tour

Thank you for your letter of 19 November 2012.

Our approach to tax is set out on page 51 of our 2011 Annual Report (copy attached). You will note that we seek to build constructive, open working relationships with tax authorities through full disclosure, and that our tax affairs are broadly up to date in the jurisdictions in which we operate.

By way of background, in 2011 we paid taxes in the UK totalling around £226m, comprised mainly of employers' National Insurance Contributions (NICs) and corporation tax and, in addition, we collected around £364m on behalf of the Government in relation to our employees' income tax and NICs.

In relation to a new accounting standard, the International Accounting Standards Board (IASB) is responsible for the development and publication of international financial reporting standards (IFRSs). As part of its 2011 consultation, the IASB sought input from all interested parties on the strategic direction and the broad overall balance of its work plan, which included country by country reporting as a suggested project. We would of course adopt and comply with any new accounting standard that might be issued.

We are aware that some NGOs consider country-by-country reporting could help developing countries improve their tax investigations and collection. We are not convinced that this is the case. Indeed, developing countries themselves appear keener to enhance their administrative and technical capabilities so as to strengthen their tax authorities' collection capability. In this respect we support the role HMRC plays in providing assistance to such countries.

We are aware that the Tax Committee of The Hundred Group have also written to you on these issues; we fully endorse the views expressed by them.

Yours sincerely

A handwritten signature in black ink, consisting of a stylized 'I' and 'K' with a horizontal line extending from the 'K'.

Ian King

Mr Stephen McPartland MP
House of Commons
London
SW1A 0AA

10 December 2012



Dear Mr McPartland,

I wanted to thank you for your letter of 19th November on corporate tax transparency.

At Barclays we take our tax obligations very seriously. Regarding your first question, we support corporate tax transparency. As a demonstration of our commitment, we have significantly increased our tax disclosures in our Citizenship Report, which is updated annually to report on Barclays progress. Our Citizenship Report is available on our website (please see www.barclays.com/citizenship) and includes an extensive commentary on our tax position within the section dealing with 2011/12 challenges. This additional level of tax transparency that we provide goes considerably further than current disclosure requirements.

I am also pleased to say that the transparency of our tax disclosures has been recognised in the Building Public Trust Awards, where Barclays received a "Highly Commended" award for its tax reporting in 2010/2011.

Regarding your second question, we would need to consider carefully any proposal to establish a new international accounting standard with the level of detail your letter suggests. Without uniformity among accounting standards or tax rules by country, together with specialized tax and accounting rules for different industries, there is real risk that such a proposal may add confusion to readers, rather than clarity. We therefore encourage companies to be as transparent as we in explaining their unique tax affairs.

As a UK incorporated bank, our main tax authority is HM Revenue and Customs (HMRC). In both 2010 and 2011, our UK taxes borne were £1.4bn, with UK corporation tax of £300m in 2011. However, our UK corporation tax figure cannot be compared against our overall, global profit before tax in 2011,

because a significant portion of that profit was earned via operations outside of the UK and is generally, therefore, not subject to tax in the UK. Barclays profit from UK activities in 2011, against which the corporation tax figure can reasonably be calculated, was approximately £1bn.

I hope that the information in response to your query is helpful and demonstrates our commitment to corporate tax transparency.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Antony Jenkins', with a stylized flourish at the end.

Antony Jenkins
Group Chief Executive, Barclays Bank plc



18 December 2012

Stephen McPartland MP
House of Commons
London SW1A 0AA



Dear Mr McPartland

Corporate Tax Transparency

Thank you for your letter of 19 November to BG Group's Chief Executive Sir Frank Chapman, who has asked me to reply on his behalf.

BG Group recognises the importance of transparency of the payments that we make to governments and the contribution such transparency makes to good governance and long term economic development in the countries where we operate. To that end, BG has supported the Extractive Industries Transparency Initiative (EITI) since its inception. Details of BG's support can be found on the EITI website. BG believes that EITI, which brings together all the relevant stakeholders, remains the most appropriate framework for enhancing transparency in the extractive sector. In Transparency International's 2012 survey, *Corporate Reporting: Assessing the World's Largest Companies*, BG was ranked fifth and extractive companies occupied six of the top ten places. I believe this reflects the contribution that the sector has made in recent years to enhancing transparency.

You will be aware of legislation introduced in the US and a draft EU Directive that impose country-by-country and project-level reporting requirements on extractive companies. BG Group has engaged with the British government and EU institutions to help shape the EU Directive so that it is fit for purpose and produces meaningful transparency in the extractive sector when it comes into force. We have made clear to both the British Government and the EU institutions our support for country-level reporting. Given the moves towards legislating for transparency and the existence of EITI, BG Group does not believe that a new accounting standard is required in this area.

If you would like to know most about BG Group's approach to this issue, please contact my colleague Michael Barron [REDACTED]

Yours sincerely

Sir John Grant KCMG
Executive Vice President
Policy and Corporate Affairs

Sir John Grant
Executive Vice President
BG Group
100 Thames Valley Park
Reading
Berkshire RG6 1PT

Stephen McPartland
MP for Stevenage
House of Commons
London
SW1A 0AA



Caoimhe Buckley
Head of Public Affairs, Europe

BHP Billiton International Services Limited
Neathouse Place
London SW1V 1LH
United Kingdom

28th November 2012

Re: Corporate Tax Transparency

Dear Mr McPartland,

Thank you for your letter addressed to Marius Kloppers, Chief Executive BHP Billiton regarding corporate tax transparency. I have agreed to address the points raised in your letter.

To provide some context: BHP Billiton is listed on the London Stock Exchange (25 per cent of our institutional shareholders are based in the UK) and we have a petroleum operation in Liverpool Bay. The vast majority of our operations are overseas, in Australia, USA, South America and South Africa. Last year, we paid over US\$1.85 billion in dividend payments and we procured US\$1.22 billion from British companies. We employ over 100,000 people, 400 of whom are based in the UK. We contribute 1 per cent of our pre-tax profits to community initiatives and in the UK; we have a US\$10 million investment in University College London, which funds the Institute for Sustainable Resources. Last year, we paid US\$115 million in taxes here in the UK, excluding dividend taxes.

BHP Billiton is in favour of greater tax transparency. We are already one of the world's most transparent companies – in fact Transparency International ranked us third globally for the openness of our reporting

(http://www.transparency.org/whatwedo/pub/transparency_in_corporate_reporting_assessing_the_worlds_largest_companies)

We already publish details of the taxes and royalties we pay to government on a country by country basis and we were founder members of the Extractive Industries Transparency Initiative – a partnership between governments, industry and civil society to enhance transparency of payments to governments with the goal of tackling corruption.

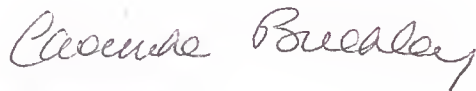
On your question regarding an international accounting standard, you will no doubt also be aware of recent US legislation under the Dodd-Frank Act, and forthcoming EU legislation directed at the extractives industry. We believe that this is likely to provide the regulatory basis to promote transparency in this sector. We hope to see similar requirements rolled out in other jurisdictions to create a global level playing field for the extractives industries. For that

reason, we would not support the creation of an additional accounting standard, especially as we provide much of this information already, with information on subsidiaries supplied to Companies House and country by country payments disclosed on page 42 of our Sustainability Report

(http://www.bhpbilliton.com/home/aboutus/sustainability/reports/Documents/2012/BHPBillitonSustainabilityReport2012_interactive.pdf).

Finally, I would urge you and Christian Aid to consider the role of capacity building in countries where tax authorities are weaker and consider the role that multinational companies, like BHP Billiton, as well as HM Government, can play in that capacity building in developing countries.

Yours sincerely,



Caoimhe Buckley
Head of Public Affairs, Europe



Peter Mather

Group Regional Vice President, Europe
& Head of Country, UK

BP p.l.c.
1 St James's Square
London
SW1Y 4PD
United Kingdom

10 December 2012

Mr S McPartland MP
House of Commons
London
SW1A 0AA



Dear Mr McPartland

Thank you for your letter of 19 November to Bob Dudley, regarding tax transparency which has been passed to me as Group Regional Vice President, Europe and Head of Country, UK.

We work with many governments, non-governmental organisations and international agencies to improve transparency in revenue flows from oil and gas activities in resource-rich countries, so that citizens of those countries have the information and institutional means to hold public authorities accountable for the way they spend revenues.

We believe that tax systems should balance the generation of tax revenues with the encouragement of business investment through simple and efficient systems designed to allow competitiveness, while maintaining transparency and good governance in business and government. The quality of tax policy and the tax administration are of equal importance. We are committed to complying with tax laws in a fully responsible manner both to shareholders and governments, effectively managing tax risk and engaging in honest and constructive relationships.

The taxes that we pay are a significant part of our economic contribution to the countries in which we operate. In 2011, we paid \$16 billion in corporate income and production taxes, compared with a \$12 billion total in 2010 and \$10 billion total in 2009. It is important to recognise that we also bear other taxes such as import and export taxes, employers' taxes, withholding taxes and indirect taxes. In addition, we collect then pay to governments VAT and sales taxes, payroll taxes and withholding taxes which in total are greater than taxes borne by us.

As a founding member of the Extractive Industries Transparency Initiative (EITI) and an alternate member of the initiative's board, we work with

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London SW1Y 4PD

governments, non-governmental organisations and international agencies on increasing transparency of revenue flows. We have been active in our support of the country-level efforts towards EITI certification in countries where we operate.

We are also participating in consultations on new and proposed revenue transparency reporting requirements in the US and Europe for companies in the extractive industries. We will fully comply with the applicable mandatory disclosure regulations when they come into effect. We believe that these measures will provide the regulatory basis to deliver enhanced levels of transparency for the extractive industries sector and that a new accounting standard is not required. The additional information listed in your letter is often routinely provided to fiscal authorities.

We urge Governments and Civil Society organisations to focus on capacity building in relation to the Tax Administrations in developing countries, and to consider the role that multinational companies can play in this effort. This would be a more effective way of identifying and dealing with companies that engage in unacceptable tax planning.

Yours sincerely

Best wishes,


Peter Mather
Group Regional Vice President, Europe & Head of Country, UK

Stephen McPartland MP
House of Commons
London
SW1A 0AA



Monday 7th January 2013

Dear Stephen,

Tax Justice Bus Tour

Thank you for your letter of 19 November 2012.

By way of background, British Land is a UK Real Estate Investment Trust (REIT). REITs are a government supported, internationally recognised investment vehicle which provide an opportunity for shareholders of all sizes, including individuals, to invest in property as if they owned the property directly. British Land became a REIT on 1 January 2007 when it paid a conversion charge of more than £300 million (2% of the market value of its investment properties) to HM Revenue & Customs (HMRC).

REITs are not liable to tax on their rental income or capital gains from their activities which are paid by the investor/individual instead. REITs must distribute 90% of income to their shareholders and British Land paid £231 million for the year ending 31 March 2012. British Land's largest shareholders are mainly large institutional investors and around 10% of shares are owned directly by small investors.

We also draw your attention to our Socio-Economic Contributions Report 2012. We are investing in the UK economy and communities around the UK through our £2.1 billion development programme. Between 2011 and 2015, British Land will contribute £1.2 billion to the UK economy and create 32,300 jobs through its construction projects.

In response to your questions, British Land supports corporate tax transparency, as shown by our published accounts where we explain our Tax Strategy, providing background detail on REIT status, what it means to be a REIT together with detail of our relationship with HMRC.

Finally, we are always ready to engage with the relevant bodies which govern international reporting standards in discussions about the best way to provide further information on country-by-country reporting either independently as British Land or in co-operation with The Hundred Group of Finance Directors. However, it should be noted that more than 95% of our assets are currently based in the UK.

Thank you for taking the time to write.

Yours sincerely

**Chris Grigg
Chief Executive**

York House, 45 Seymour Street, London, W1H 7LX



**BRITISH AMERICAN
TOBACCO**

3rd December 2012

Mr McPartland MP
House of Commons
London SW1A 0AA

Nicandro Durante
Chief Executive

Globe House
4 Temple Place
London WC2R 2PG
United Kingdom

www.bat.com

Christian Aid's Tax Justice



Dear Mr McPartland

Thank you for your letter of 19 November, 2012.

British American Tobacco is one of the most geographically diverse companies in the world with operations in over 180 countries. The Group is fully committed to paying the correct amount of tax in all of the countries in which it does business and is committed to a policy of full disclosure with all tax authorities.

In 2011 the group paid £1.447 bn of corporation tax to governments around the world and collected and paid over £30.7 bn of sales and excise taxes to governments. In addition, many million pounds of employment taxes have been collected and paid to governments.

We share Christian Aid's view that paying the correct amount of tax on time is one of the very helpful measures that all multinational companies can do to assist both developed and developing countries.

In our own industry sector the illicit trade in tobacco products – smuggled, counterfeit or tax avoided in other ways – is estimated to account for up to 12% of world consumption. This is a black market estimated at up to 660 billion cigarettes a year losing governments up to \$40bn a year in tobacco taxes. British American Tobacco is fully committed to helping governments try to reduce or eliminate this problem.

The suggestion that country by country reporting of various tax and financial data would help to reduce underpayments of corporate tax is, we believe, unfounded. Tax authorities around the world already collect the data they require through the normal corporate tax return process and tax audit process.

We are aware that HMRC sends staff to other countries from time to time. That is an initiative we fully support and believe that the best way forward for developing countries is for the more sophisticated tax authorities to share best practice with other authorities.

Yours sincerely

Nicandro Durante



Stephen McPartland MP
Member of Parliament for Stevenage
House of Commons
London
SW1A 0AA



26 November 2012

Dear Stephen

Thank you for your letter dated 19 November.

BT is transparent in its tax affairs, as an examination of any of our annual reports will demonstrate. We have been commended for the quality of our tax disclosures in our annual report, which already includes a detailed description of BT's tax position.

In our annual report we show the different sums coming from payroll taxes, sales taxes, corporation tax etc.

In 2012, our total tax contribution to the UK Exchequer was £3.3 billion, up from £2.9bn the year before - amounts which resulted in us being ranked fifth highest contributor according to the Hundred Group Total Tax Contribution Survey.

Most of our revenue is earned in the UK and most of our tax is paid here.

I do applaud what I suspect motivates in part your proposal - the desire to ensure a level playing field between firms operating in the UK when it comes to tax. That said, I can't at present support the specific idea you advance.

We deliver services in more than 170 countries and of course fulfil the tax and reporting obligations wherever we operate. This takes a considerable amount of time, effort and expense and I am not inclined to volunteer to devote yet more resource to yet more reporting. Any money spent on reporting is money that could be spent on investment, and it's investment that's the top priority at present.

With best wishes.

Yours sincerely

IAN LIVINGSTON

Ian Livingston
Chief Executive Officer
BT Group

BT Centre
81 Newgate Street
London EC1A 7AJ
United Kingdom



BT Group plc
Registered Office:
81 Newgate Street, London EC1A 7AJ
Registered in England and Wales no. 4190816
www.bt.com

CAPITA

Stephen McPartland MP
House of Commons
London
SW1A 0AA



3 December 2012

Dear Mr McPartland

Thank you for your letter to Paul Pindar. I am responding to this on behalf of Capita plc.

Capita is entirely supportive of tax transparency. As a consequence of our close and transparent relationship with HMRC, we are already treated as a low-risk taxpayer in terms of complying with our tax obligations and it is our intention to maintain this level of trust that HMRC already confers upon us. Capita also publishes in its annual report and accounts how much the group's tax charge is reduced as a result of carrying on business in lower tax jurisdictions and this was £6.7m in 2011. It is important to note that this reduction is entirely attributable to arm's length trading, primarily with third-party clients, in these jurisdictions. The Capita group does not enter into any arrangements with affiliates for the purposes of securing a reduction of UK taxes.

Finally Capita is both comfortable and supportive of your interest in establishing a new international accounting standard along the lines proposed. The only obvious caveat is that we would not expect any such change in practice or regulation to result in any disproportionate increase in effort and cost associated with filing accounts and the fees for audit.

Yours sincerely

Gordon Hurst
Group Finance Director

Mr Stephen McPartland MP
House of Commons
London
SW1A 0AA

RECEIVED

21 JAN 2013

www.centrica.com

15 January 2013

Dear Mr McPartland MP,

Thank you for your letter to Sam Laidlaw regarding corporate tax transparency, which has been passed to me as Group Finance Director. I can assure you that Centrica are supportive of the work to promote transparency of corporate taxes. 'Ensuring openness and transparency' is one of our eight business principles that set out our commitment to operate fairly and with integrity wherever we work in the world. Our business principles are outlined on our website at www.centrica.com/businessprinciples.

Our approach is to pay the correct amount of tax in the right jurisdictions, reflecting the underlying commercial transactions across our business and fulfilling our legal obligations. In determining the correct amount of tax, we seek to maintain shareholder value (as judged against market-led performance benchmarks), taking a long-term view. A necessary element of this is ensuring that activities are carried out in a tax-efficient manner. So, we look to maintain the same rigorous controls around tax-related costs as any others.

Recognising the legitimate debate in wider society about taxation, we seek to be open about our approach, to disclose amounts paid and collected in different jurisdictions, and to engage constructively with interested parties (within constraints of commercial confidentiality) about how we interpret our legal obligations.

To this end, we continue to publish in our annual report and accounts information about taxes we pay. In 2011, our effective tax rate was 40%, and this increased to around 45% in 2012 when we paid around £1bn in tax. To outline the sources of our tax in 2011, I've included a chart with this note that shows the direct taxes we paid in 2011. Later this year we will publish updates to these and other figures on our website using 2012 data.

We also make a major contribution to the economic life of the communities of which we are part – through the jobs we create, the spending we undertake with suppliers,



the taxes we pay to governments and the returns we make to investors who provide us with capital to finance the business.

I trust this information is helpful. Should you require further information, please contact Jeff Oatham, Centrica's Head of Corporate Responsibility at [REDACTED] or [REDACTED]

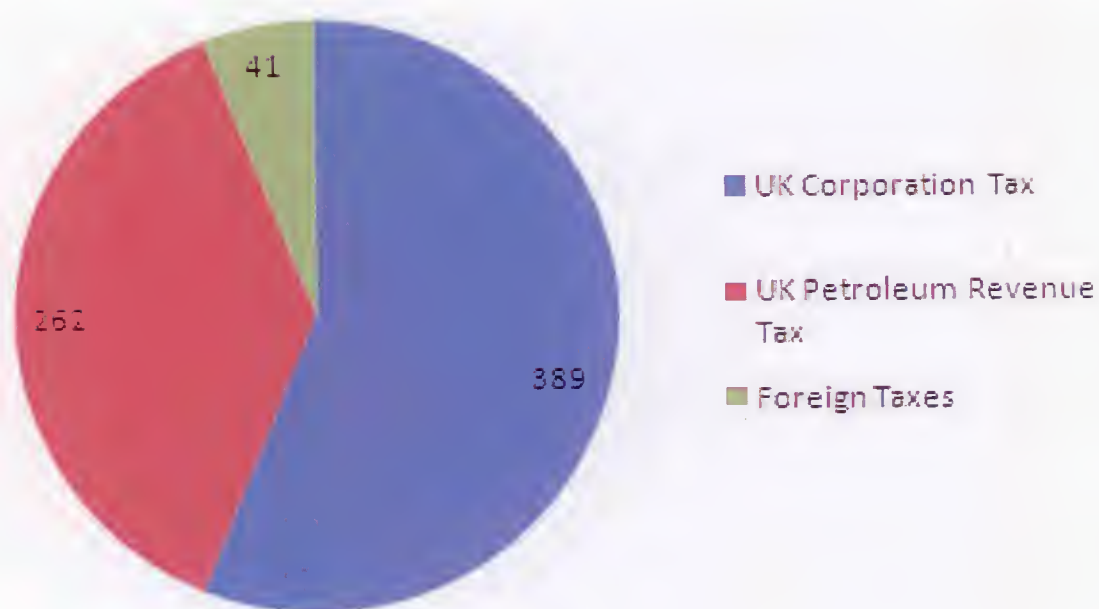
Yours sincerely,

A handwritten signature in cursive script, appearing to read "Nick Luff".

Nick Luff
Group Finance Director

Appendix

2011 Direct Taxes Payable - £m





From the office of:

Richard Cousins
Group Chief Executive

Stephen McPartland MP
House of Commons
London
SW1A 0AA



19 December 2012

Dear Mr McPartland,

Tax Justice Bus Tour

Thank you for your letter of November 19 asking for our views on corporate tax transparency and the reporting of financial information on a country-by-country basis.

Taking transparency first, Compass Group has already made a very clear and public commitment in support of this as a principle and we have stated in our Annual Report that we plan and manage our tax affairs in all jurisdictions in full compliance with the relevant local laws and disclosure requirements.

As far as the provision of detailed financial information on a country-by-country basis is concerned, again I would point out that in all territories in which we operate our subsidiary companies prepare their financial statements in full compliance with local accounting standards. In this sense our view is that all necessary financial information is already made available to tax authorities to ensure they are in a position to collect the right amount of tax from us as determined by local law.

Finally, I am aware of a reply to you from The Hundred Group of Finance Directors. In general terms I echo the views expressed in that letter, particularly that it should primarily be the role of organisations such as the OECD to take the lead on driving change here.

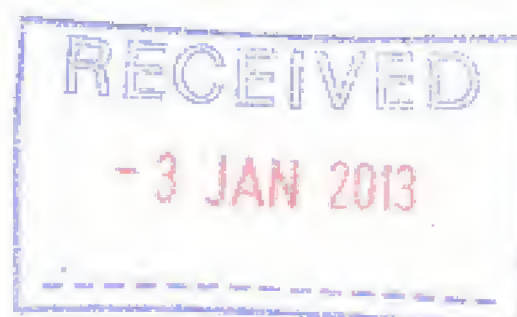
Yours sincerely,

Richard Cousins
Group Chief Executive

Compass Group PLC
Compass House, Guildford Street, Chertsey, Surrey KT16 9BQ
[Redacted]
Registered in England, Registered Number 4083914, VAT number 466/4777/01

Executive
Chief Financial Officer

Mr Stephen McPartland MP
House of Commons
LONDON
SW1A 0AA



Lakeside Drive
Park Royal
London
NW10 7HQ

www.diageo.com

18 December 2012

Dear Mr McPartland,

Re. Tax Justice Bus Tour

Thank you for your recent letter to Paul Walsh regarding the Christian Aid Tax Justice Bus Tour and your proposals regarding tax transparency and country by country reporting.

Diageo firmly supports tax transparency and we have a dedicated Global Tax Policy which sets out the scope and principles of Diageo's management of its tax affairs. This is publicly available at <http://www.diageo.com/en-row/ourbusiness/aboutus/corporategovernance/Pages/codes-policy.aspx> and is reviewed annually. You will note that:

- a. We are committed to paying tax in accordance with all relevant laws and regulations in the territories in which we operate.
- b. We are committed to the effective, sustainable and active management of our tax affairs in support of outstanding business performance in the territories in which we operate and, as with all other aspects of our business, to maximise shareholder value
- c. We actively endeavour to develop and sustain good and honest working relationships with Tax Authorities and to encourage the representation of our views on the formulation of tax laws either directly or through trade associations or similar bodies.

In addition, Diageo publishes a cash value added statement in its Sustainability and Responsibility Report which can be viewed at <http://srreport2012.diageoreports.com/our-impacts/socio-economic-development/local-wealth-creation.aspx>. This shows that our global tax contribution was almost £4.5bn last year. Indeed, worldwide the amount of excise Diageo collects for governments is in excess of our global profits.

I am proud of Diageo's economic contribution. In the UK, we have more than 5,000 employees at over 50 sites. Our operations generated over £1.2bn in revenues for the Exchequer last year, and in June we announced a £1bn investment over the next five years in Scotch whisky, creating UK jobs.

Regarding international accounting standards and country by country reporting, you will be aware that we fully comply with international accounting standards and if so required, would comply with any new standard that may be issued. However, we do not support country by country reporting as the information you mention in your letter is already available to individual tax authorities. Furthermore, calculations using international accounting standards



JOHNNIE WALKER



GUINNESS



Captain Morgan

Jose Cuervo



srreport2012.com

do not equate to taxable profits which are calculated in a different way as required by individual country laws. As such, publishing information could not only be hugely burdensome, but also potentially misleading.

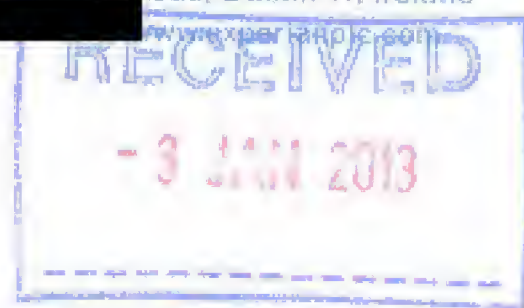
We will continue to contribute to the debate on what is appropriate transparency for UK headquartered Multinational companies ('MNCs') to adopt that is helpful to our many stakeholders.

Many thanks for your enquiry.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Deirdre Mahlan', written in a cursive style.

Deirdre Mahlan
Chief Financial Officer
Diageo plc



Stephen McPartland MP
House of Commons
London, SW1A 0AA
United Kingdom

21 December 2012

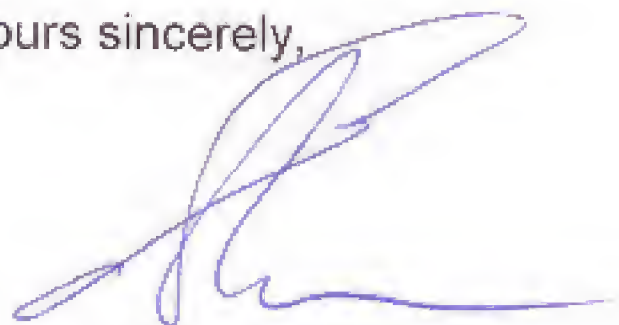
Dear Mr McPartland,

Thank you for your letter of 19 November, to which I am responding to in my role as Company Secretary for Experian plc.

Experian's Chief Financial Officer is a member of The Hundred Group and we understand the Group's Chairman, Andrew Bonfield, has written to you with a detailed response to the points outlined in your letter to FTSE-100 companies. This letter complements that response.

At Experian we take our tax responsibilities very seriously and comply with all relevant tax laws, submitting all required returns and paying all taxes that are due. In doing so, we engage with the tax authorities in each country of operation, including HM Revenue & Customs in the UK. We support and demonstrate tax transparency in our annual report, comply with all applicable country-specific and international accountancy standards, and would of course review any proposed new accountancy standards.

Yours sincerely,

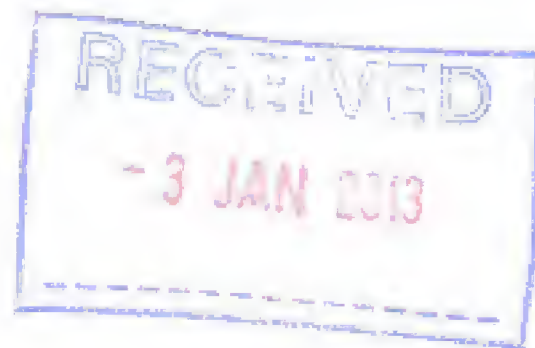
A handwritten signature in blue ink, appearing to be "Charles Brown", written over a horizontal line.

Charles Brown
Company Secretary
Experian plc

Mr Stephen McPartland MP
House of Commons
LONDON
SW1A 0AA

19 December 2012

Dear Mr McPartland,



GlaxoSmithKline

GlaxoSmithKline plc
980 Great West Road
Brentford
Middlesex
TW8 9GS

Letter regarding Tax Justice Bus Tour

I am writing in response to your letter to Sir Andrew Witty of 19 November 2012, regarding the Christian Aid Tax Justice Bus Tour and corporate tax transparency. Andrew has asked me to reply to you on his behalf.

Firstly, we recognise and accept our responsibility to pay the appropriate amount of tax on the profits we generate in each country where we operate. We also support corporate tax transparency as a principle. As a company with deep roots in the UK, we also support the need for investment and incentivisation to increase opportunities for economic growth in this country.

Secondly, we are a member of the Hundred Group, which represents companies in the FTSE 100 and whose aims include promoting the competitiveness of the UK for UK businesses. I have therefore had the opportunity to read a copy of the response sent to you by the Hundred Group dated 17 December, 2012.

GSK agrees with the views set out by the Hundred Group and, in particular, the observation that an important part of ensuring tax transparency is improving the exchange of information and enhancing the administrative capabilities in developing countries. There are established international protocols for the exchange of information between tax authorities which, when utilised effectively, should allow tax authorities to validate that appropriate tax is being paid in the correct jurisdictions. We believe that these mechanisms, if used effectively, should provide the tax authorities in the UK and elsewhere with sufficient transparency to address your concerns.

Yours sincerely,

Simon Dingemans
CFO
GlaxoSmithKline plc.

Stephen McPartland MP
House of Commons
London
SW1A 0AA




www.hl.co.uk

IG/VB
29th November 2012

Dear Mr McPartland

Thank you for your recent letter regarding tax and "tax dodging" as you put it.

Hargreaves Lansdown was recently named as one of only two FTSE 100 companies to not employ offshore companies as part of its corporate tax structure. We pay all our UK taxes in full, last year's marginal rate of payment of 26% being closely equivalent to the published full UK corporate tax rate. Hargreaves Lansdown PLC, the directors, founders and employees are major contributors to the UK Exchequer. Sometimes we wonder what we get back for it but there is no doubt at Hargreaves Lansdown we pay our dues in full.

I would not support a new international accounting standard regarding corporate tax. The focus should be on making companies that fail to pay tax pay up, and then seeking to spend the money received wisely, not asking companies to write about it. Annual reports are already weighty tomes which mainly line the pockets of accountants and lawyers. Our annual report is already over 90 pages long as a result of existing corporate disclosure requirements. There is little interest in reading it, despite our efforts to try and make it as interesting as possible and shorten it. I think we sent out 380 copies this year. I hardly think the threat of additional disclosure in the annual report is therefore going to cause a corporate tax revolution.

Making companies undertake additional disclosures would add cost and bureaucracy to businesses, not collect more tax.

There are some very highly paid civil servants who are supposed to be collecting taxes. If they cannot collect the taxes that should be due from corporates that are "dodging" their obligations they should try harder or be given the tools to do so. Alternatively we could have fewer civil servants, which would reduce public sector costs and therefore the need for tax in the first place.

You asked for my views and there they are. You are welcome to publish them.

In the meantime, please be assured Hargreaves Lansdown and its directors will continue to pay our taxes and remain good UK corporate citizens.

Yours sincerely


IAN GORHAM
CHIEF EXECUTIVE OFFICER

Iain J Mackay
Group Finance Director

27 November 2012

S McPartland Esq, MP
House of Commons
London SW1A 0AA

Dear Mr McPartland,

Tax Justice Bus Tour

Thank you for your letter of 19 November.

I note, with interest, your comments on the tax gap. I am pleased to assure you that HSBC has paid and continues to pay an appropriate level of tax in the UK and in the rest of the world. On page 30 of our Interim Report, we reported our effective tax rate globally as 28.5%. As you will see from page 9 of the Sustainability Report, in 2011 we paid \$1.5 billion of tax in the UK and \$8 billion globally. I enclose copies of our Annual and Interim Reports and Accounts and our Sustainability Report for your information.

As regards your first point on tax transparency, this is something we at HSBC take very seriously, both in respect of our own tax position and in respect of our customers. At a corporate level we are conscious of the need to pay our fair share of taxes. We are also embarking on an initiative to seek to ensure, as far as possible, that HSBC's banking services are not used to facilitate tax evasion. I very much support your initiative on tax transparency and would be happy to offer HSBC's assistance in developing an effective standard on the same.

As regards your second point, our Annual Report and Accounts already contains a significant amount of country-by-country information and, as a banking group, HSBC is closely regulated in all the countries in which we operate. The names of all HSBC's subsidiaries are available as part of an annual filing requirement with UK Companies House and there is a simplified structure chart in the Annual Report and Accounts. I would sound a note of caution about requiring more detail through a new accounting standard – as things stand our Annual Report and Accounts already runs to well over 400 pages of disclosures. However, we would support any initiative that would increase country-by-country tax transparency as part of our sustainability reporting.

I am sure you will be aware that HSBC has recently set out a new corporate strategy to ensure that we adapt to meet changing investor and regulatory requirements. However, our commitment to invest in the long-term future of the communities in which we operate has remained constant. In addition to fulfilling our tax obligations, we also provide support to communities around the world by funding a variety of programmes and charities. As an example, in June we announced a five year, US\$100 million Water Programme which aims to

HSBC Holdings plc
Level 42, 8 Canada Square, London E14 5HQ

Web: www.hsbc.com

Registered in England number 617987. Registered Office: 8 Canada Square, London E14 5HQ.
Incorporated in England with limited liability



Iain J Mackay

Group Finance Director

secure better access to and more sustainable use of this critical and precious natural resource. Furthermore, in October we announced a partnership with the Prince's Trust Fairbridge programme through which we commit to donating £5 million over 5 years to help some of the most vulnerable young people in the UK by supporting their education, training and, ultimately, employment.

We strongly believe that all companies should seek to support the communities in which they operate and we are working hard to ensure that we have a positive economic and social impact for years to come. Improving tax transparency can only help in this wider effort. I hope that this is helpful to you.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Iain J Mackay", with a large, stylized flourish extending from the end of the signature.

HSBC Holdings plc

Level 42, 8 Canada Square, London E14 5HQ

Web: www.hsbc.com

Registered in England number 617987. Registered Office: 8 Canada Square, London E14 5HQ.
Incorporated in England with limited liability

20 December 2012

IMI

Mr Stephen McPartland MP
House of Commons
London
SW1A 0AA



Dear Mr McPartland

Thank you for your letter dated 19 November 2012 sent to our CEO who has asked me to respond.

IMI is already committed to tax transparency and co-operates fully with the tax authorities in all the jurisdictions in which we operate. We also provide substantial financial information in the audited accounts of our subsidiary companies around the world and, of course, provide full disclosure of our tax affairs in the local tax returns.

I would also comment that the tax laws of many countries apply to our international business and it is important that any one country's specific tax laws are carefully considered in an international context. The alleged abuses by a few companies should not unduly impact on the many other international organisations that have developed successful and legal international trade arrangements over many years.

HM Treasury has significantly improved the UK Business climate (including reform of corporate tax laws) in recent years to attract business to the UK to grow the international status of this country as a great location for business. This will substantially improve UK employment, international competitiveness of UK business, support smaller local ancillary UK businesses, and drive UK growth and prosperity. To avail oneself of these valuable incentives the UK offers does indeed lower legitimately the UK corporation tax bill, but should be recognised as a tribute to the UK Government's foresight of expanding UK trade, rather than being discredited. It should not therefore be forgotten that UK companies pay and collect many different types of taxes for the Exchequer, not just corporation tax and their activities also provide far broader benefits to the UK. These initiatives by HM Treasury are therefore to be welcomed and help the UK position itself strongly in Europe, and indeed on the world stage, in what is a very fragile global economy.

I am not convinced that there is a need for the new international accounting standard to which you allude.

Yours sincerely

Douglas Hurt
Finance Director

cc Martin Lamb

21 December 2012



Mr Stephen McPartland MP
House of Commons
London
SW1A 0AA



Inmarsat plc
99 City Road
London EC1Y 1AX
United Kingdom
www.inmarsat.com

Dear Mr McPartland

Tax Justice Bus Tour

Thank you for your letter of the 19th November addressed to our CEO Mr Rupert Pearce. He has referred it to me for a response.

First, we were surprised to receive your letter as Inmarsat plc is not a member of the FTSE 100. However I personally am a member of The Hundred Group of Finance Directors and therefore received a copy of Mr Andrew Bonfield's response dated 17th December to your letter.

I am writing in support of the comments made in Mr Bonfield's letter. I would also add that we support financial reporting transparency and comply with the disclosure requirements of International Financial Reporting Standards as well as all relevant legislation in the countries in which we operate.

Inmarsat plc contributed a total of £63m in taxes to the UK government in 2011 on a UK pre-tax profit of £316m; at the same time we are investing over £1bn in launching four new satellites which will create over 200 new jobs in Inmarsat alone, as well as providing a significant amount of work for the European satellite industry.

We do not support a new accounting standard requiring country-by-country disclosure. This information is of little relevance to the vast majority of our shareholders and other stakeholders; the existing annual report is already overly long and complicated and has far too many bureaucratic and irrelevant disclosures. We see little value in adding to this disclosure. The detailed country-by-country information you suggest we disclose is already reported to individual tax authorities in the countries in which we operate

Yours sincerely

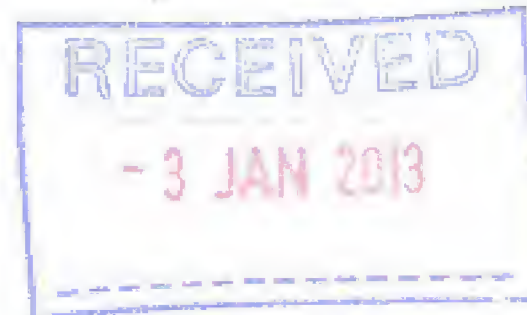
A handwritten signature in black ink, appearing to read "Rick Medlock".

Rick Medlock
Chief Financial Officer

Richard Solomons
Chief Executive Officer

Broadwater Park
Denham
Buckinghamshire UB9 5HR
United Kingdom

Mr Stephen McPartland MP
House of Commons
London
SW1 A 0AA



21 December 2012

Dear Mr McPartland

Tax Justice Bus Tour

Thank you for your letter on corporate tax transparency.

InterContinental Hotels Group (IHG) is a FTSE-100 company and operates nine hotel brands globally including InterContinental, Crowne Plaza and Holiday Inn. Almost 90% of our hotels are franchised – we own just 10 hotels globally.

You will have received a letter from The Hundred Group, of which IHG is a part, sent on behalf of its members. We support the views expressed in this letter.

To reiterate, we are in favour of transparent reporting to tax authorities. We also support the development of better links between countries' tax authorities to ensure that profits are fairly allocated and taxed in accordance with agreed international principles.

One of the best ways to achieve this is to build the capacity of tax authorities in developing countries so that they can collect appropriate taxes and apply those principles. In our view, an approach which focuses on capacity building in developing countries would be the most constructive therefore. The private sector has a supporting role to play in this and we are in discussions with The Hundred Group on how we can best work with these authorities.

If you have further questions we would be happy to meet with you.

Yours sincerely

Richard Solomons



BETTER
HOMES,
BETTER
LIVES

RECEIVED

21 JAN 2013

Mr McPartland MP
Tax Justice Bus Tour
House of Commons
London
SW1A 0AA

16 January 2013

Dear Mr McPartland

We refer to your letter concerning the Christian Aid Tax Justice Bus Tour and the comments you made and about tax transparency and country by country reporting. We are aware of and fully endorse the comments made by the Hundred Group in its response to your letter.

At Kingfisher it is important to us and it is our policy to pay all the taxes legally due in all of the jurisdictions in which we operate. Our reporting also complies with all of the relevant accounting standards.

With over 1,000 stores in eight countries in Europe and Asia we serve 6 million customers and employ 80,000 people which means our wider economic contributions in these countries is also considerable.

Yours sincerely

Ian Cheshire
Chief Executive of Kingfisher plc

Andrew Bonfield
Chairman: The Hundred Group Tax
Committee
c/o National Grid Plc
1-3 The Strand
London
WC2N 5EH
[REDACTED]



The Hundred Group
of Finance Directors

Tax Committee

Mr Stephen McPartland MP
House of Commons
LONDON
SW1A 0AA

17 December 2012

Dear Mr McPartland

Letter regarding Tax Justice Bus Tour

We are writing to you about your recent letter to FTSE 100 Chief Executives regarding the Christian Aid Tax Justice Bus Tour and your proposals regarding tax transparency and country by country reporting. We have been contacted by many of our members in relation to this letter and wanted to raise our views directly with you.

Who we are

The Hundred Group represents the views of the finance directors of FTSE 100 and several large UK private companies. Our member companies represent almost 90% of the market capitalisation of the FTSE 100, collectively employing over 7% of the UK workforce and in 2011, paid, or generated, taxes equivalent to 13% of total UK Government receipts. Our overall aim is to promote the competitiveness of the UK for UK businesses, particularly in the areas of tax, reporting, pensions, regulation, capital markets and corporate governance.

Our views

Your letter makes reference to estimates by Christian Aid of uncollected taxes in the UK of £35 billion. Whilst we are unable to comment on the accuracy of these estimates, we do point out that analysis by HMRC in October ("Measuring Tax Gaps 2012"), suggests that the estimated tax gap attributable to large corporations is a much smaller number than the amount quoted in your letter.

The members of The Hundred Group are already committed to tax transparency and they co-operate fully with the tax authorities in the jurisdictions in which they operate. As you are aware, HMRC is currently consulting on a general anti-abuse rule ("GAAR"). In our letter of response to the consultation we stated "as representatives of responsible businesses we welcome proposals to introduce provisions that are focussed on abusive and wholly artificial arrangements and which are balanced and proportionate". A copy of our letter is attached.

Finally, we note your request to support a new international accounting standard on country by country reporting. You may be aware that all of our members are required to adopt new international accounting standards and if so required, would comply with any new standard that may be issued. Whilst we understand the desire to improve transparency as suggested in your letter, we have the following reservations about country by country reporting as set out therein:

1. The detailed information that you set out in your letter is already available to individual tax authorities and is of little relevance to the vast majority of our stakeholders who are the primary users of member's annual reports.
2. The information may be misleading as accounting profits as calculated under international accounting standards do not equate to taxable profits which are calculated in a different way as required by the laws of the individual country. Explaining the difference could be burdensome and may also breach taxpayer and commercial confidentiality.

We believe that one of the ways transparency can be improved is by helping developing countries ensure that they collect the appropriate taxes by supporting them to build the administrative capacity within their tax collection regimes. The Hundred Group is actively engaging a number of different organisations to see how we can best help build that capability.

We also believe that the best way for countries to have the appropriate transparency is for them to adopt laws and regulations that prescribe the level of disclosure in their national accounts, as this is a policy matter over which states retain sovereignty. Business has a supporting role to play (e.g. capacity building), but inter-governmental dialogue and supra-national organisations including the OECD, World Bank and EBRD, should be taking the lead on this issue. Transparency standards need to be developed, applied and enforced on a global basis to avoid the risk of regulatory arbitrage which will almost certainly disadvantage UK and EU companies.

We hope that you would support this effort and would be delighted to meet with you to discuss this in more depth should you wish.

Yours sincerely

Andrew Bonfield
Chairman
The Hundred Group Tax Committee

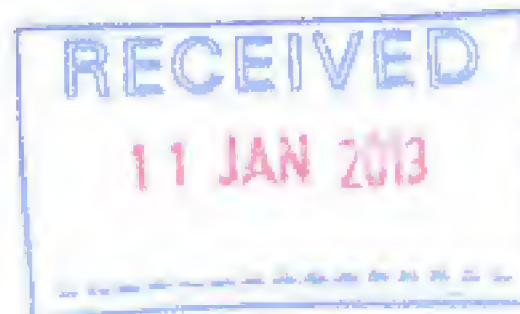
Sarah Prior
Group Director, Tax
Lloyds Banking Group

**LLOYDS
BANKING
GROUP**



Lloyds Banking Group
25 Gresham Street
St Pauls
London

Mr Stephen McPartland MP
House of Commons
London
SW1A 0AA



21 December 2012

Dear Mr McPartland

Letter regarding Tax Justice Bus Tour

I am writing to you about your recent letter to FTSE 100 Chief Executives regarding the Christian Aid Tax Justice Bus Tour and your proposals regarding tax transparency and country by country reporting.

We are unable to comment on the accuracy of the estimates made in your letter by Christian Aid regarding uncollected taxes in the UK and would note in this regard the HMRC analysis of October last ("Measuring Tax Gaps 2012"), which suggests that the tax gap attributable to large corporations is a much smaller number than the amount quoted in your letter.

For our part I would like to note that the Lloyds Banking Group takes its role as a responsible tax payer very seriously. The Group operates in an open and transparent way with HMRC and is fully compliant with its responsibilities and obligations under the Banking Code of Conduct in respect of taxation. We also take our disclosure obligations in respect of taxation very seriously and keep this matter under constant review.

I note your request for our support for a new international accounting standard on country by country reporting. You will be aware that Lloyds Banking Group is a UK centric organisation with a considerably reduced overseas presence. As such this is not a matter which is particularly in point for us.

Yours sincerely

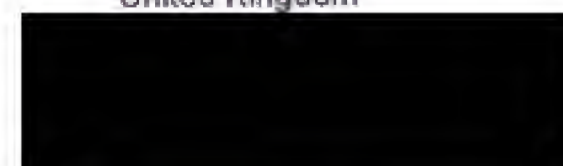
A handwritten signature in black ink, which appears to be "Sarah Prior". The signature is written over a horizontal line that extends to the right.

Sarah Prior
Group Director, Tax
Lloyds Banking Group

RECEIVED
16 JAN 2013



Lonmin Plc
4 Grosvenor Place
London
SW1X 7YL
United Kingdom



www.lonmin.com

08 January 2013

Mr Stephen McPartland MP
House of Commons
LONDON
SW1A 0AA

Dear Mr McPartland

CORPORATE TAX TRANSPARENCY

Thank you for your letter of 19 November addressed to Ian Farmer.

Lonmin conducts its business in a sustainable, socially and environmentally responsible way. That approach extends to tax - the group achieves the highest standard of compliance with its obligations wherever it operates. I explain below that Lonmin's group structure is simple and that the way it accounts for tax is transparent.

So far as the UK is concerned, the current position is straightforward. The group maintains a small head office in London (necessary because Lonmin Plc is a UK incorporated and listed company) but its other activities in the UK are few.

The overwhelming majority of the group's assets are in South Africa, where it has very substantial mining operations and where it pays tax at the applicable rates on its profits. Lonmin's mining, process and supply operations there involve no entities resident outside South Africa and it continues to transform its business in line with the Socio-economic Empowerment Charter for the mining industry, which requires the industry, among other things, to operate as an integral part of the South African economy.

The group's other activities are not material and consist mainly of exploration projects, principally in Canada. By their nature, and while contributing to economic activity, there is currently no return on these investments.

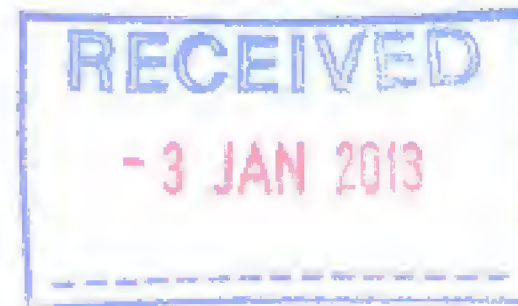
Accordingly, the information disclosed in Lonmin's accounts in relation to South African, UK and other taxes fully reflects the group's material economic activities. In these circumstances, there is little further disclosure that meaningfully could be made.

Yours sincerely

A handwritten signature in black ink, appearing to be "SJ Scott", written over the "Yours sincerely" text.

SJ SCOTT
ACTING CIEF EXECUTIVE OFFICER

Mr. Stephen McPartland MP
Member of Parliament for Stevenage
House of Commons
London
SW1A 0AA



17th December 2012

Dear Mr. McPartland

Thank you for your letter dated 19th November 2012.

We appreciate that the way in which we manage our tax affairs is an important concern for all of our stakeholders and to this effect we support transparency in all of our financial reporting, including taxation.

A fundamental tenet of our ethical and tax strategies is that we comply with the laws of all territories in which we operate and we work on the basis of full disclosure when dealing with the relevant regulatory authorities. You will see from the information contained in our Annual Report that we strive to provide a transparent and legally compliant account of our corporate tax affairs (see Notes 7 and 23 on pages 85 and 103 respectively of our 2012 Annual report).

In relation to the question of country by country reporting this is not currently a significant aspect of our business given that nearly 90% of our revenues are generated in the UK. We are, however, aware that the question of country by country reporting is a complex one and we agree with the views expressed by The Hundred Group of Finance Directors in their letter to you of 17th December 2012.

Yours sincerely

Marc Bolland
Chief Executive Officer

30 November 2012

Our ref: DP/gm

Stephen McPartland MP
House of Commons
London
SW1A 0AA



Dear Mr McPartland

Tax Justice Bus Tour

Thank you for your letter of this month regarding the Tax Justice Bus Tour.

As a company that is headquartered in the UK, we too are concerned about the tax transparency of companies which are headquartered overseas but have significant economic activity in the UK.

Morrisons is one of the biggest corporation tax payers in the UK, paying £281 million last year. We want a level playing field where all companies pay their fair share of corporation tax.

We believe it is right that we, and companies like Morrisons, should pay for the services on which we all depend. Tax calculated on economic activity that is based in the UK should stay here.

We would like to see action to ensure that a level playing field exists. In particular, a first step from the Government would be a requirement that every company that operates in the UK should disclose its corporation tax payments. We believe that this will encourage those companies that are concerned about their reputation with the wider public to ensure they pay their fair share.

We also recommend closer scrutiny of transfer payments to overseas headquarters. This transfer pricing is based on OECD guidelines but it would be helpful if officials could look again at the way these guidelines are implemented.

We urge you to put these points to your colleague, the Chancellor of the Exchequer.

Yours sincerely

DALTON PHILIPS
Chief Executive



Mr Stephen McPartland MP
House of Commons
LONDON
SW1A 0AA

RECEIVED
16 JAN 2013

Steve Holliday
Chief Executive



14th January 2013

www.nationalgrid.com

Dear Mr McPartland,

Letter regarding Tax Justice Bus Tour

I refer to your letter of 19th November 2012 and my holding reply of 21 November 2013.

Having now fully considered your letter I would like to make the following points:

National Grid is committed to tax transparency and we co-operate fully with the tax authorities in the jurisdictions in which we operate and we publish detailed information on taxation in our Annual Report and Financial Statements which are available on our website. We adopt a responsible approach to tax matters and the Finance Committee (a sub-committee of the Board) regularly reviews such matters.

We are required to adopt new international accounting standards and if so required, would comply with any new standard that may be issued. Whilst we understand the desire to improve transparency as suggested in your letter, we have the following reservations about country by country reporting as set out therein:

1. The detailed information that you set out in your letter is already available to individual tax authorities and is of little relevance to the vast majority of our stakeholders who are the primary users of our annual report. Reporting this information in the annual report will serve no useful purpose.
2. The information may be misleading as accounting profits as calculated under international accounting standards do not equate to taxable profits which are calculated in a different way as required by the laws of the individual country. Explaining the difference could be burdensome and may also breach taxpayer and commercial confidentiality.

We believe that the best approach to helping developing countries ensure that they collect the appropriate taxes is to support them to build the administrative capacity within their tax collection regimes. National Grid supports business organisations in the UK, such as the The Hundred Group of Finance Directors, in these areas.

Yours sincerely

Steve Holliday
Chief Executive

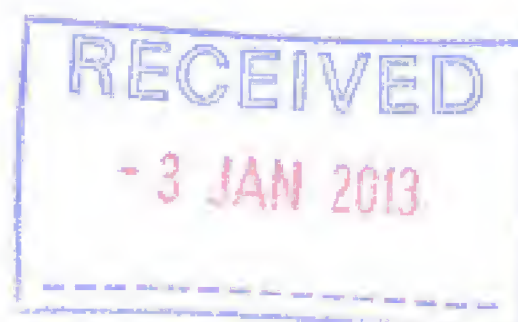


OLD MUTUAL

5th Floor, Old Mutual Place, 7 Lombard Hill, London EC3N 4GG

20 December 2012

Stephen McPartland, MP
House of Commons
London
SW1A 0AA



Dear Mr McPartland

I refer to your letter to our Group Chief Executive, Mr Roberts, dated 19 November 2012, to which he has asked me to respond.

The Old Mutual Group takes its corporate social responsibilities very seriously; I attach a copy of our 2011 Group Responsible Business Report for your reference. The Group's approach to tax throughout the world is based upon responsible compliance with the local law and transparency in our reporting and relationships with local tax authorities. In 2011 the Group paid worldwide taxes in excess of £1 billion, of which corporate tax was approximately one-third.

International Accounting Standards play an important role in improving the visibility of taxes paid, however amounts disclosed will not necessarily equate to amounts paid due to differences between tax legislation and accounting rules. It is difficult to see how a change in International Accounting Standards could address this.

The Old Mutual Group complies with existing International Accounting Standards, and would seek to comply with any new requirements were they to be introduced. However we believe that our current disclosures are suitably transparent, and would note that further information is readily available to the authorities in the jurisdictions in which the Group operates.

Irrespective of whether improved transparency in the reporting of corporate taxation is possible, it is debatable to what extent such improvements would motivate corporate tax payments. Domestic and cross border tax legislation and Government policy may have a more significant impact on corporate behaviour in this area.

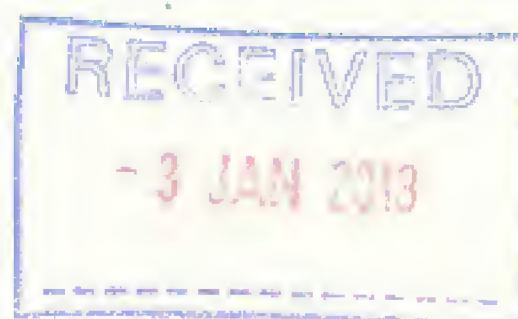
Yours sincerely

Iain Pearce
Group Chief Accountant
Old Mutual plc

Mr Stephen McPartland MP
House of Commons
London
SW1A 0AA

80 Strand
London
WC2R 0RL

www.pearson.com



20th December 2012

Dear Mr McPartland,

TAX JUSTICE BUS TOUR

Thank you for your letter of 19th November, addressed to our Chief Executive. I am replying on her behalf.

I can confirm that Pearson plc fully supports tax transparency. We demonstrate this in a number of ways:

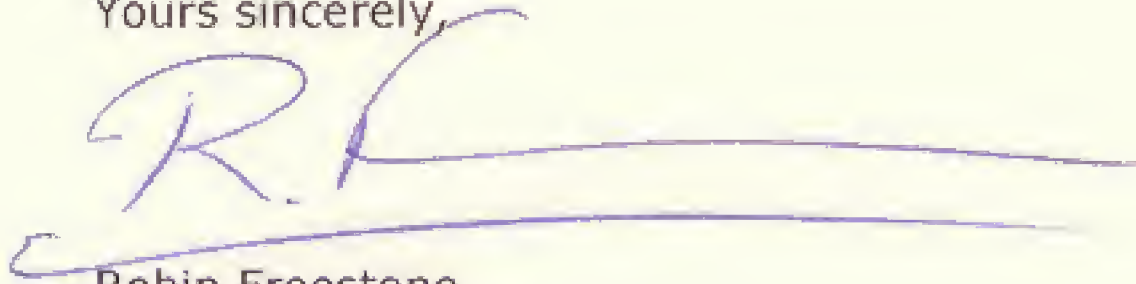
- We co-operate fully with the tax authorities in the jurisdictions in which we operate, including providing all relevant information,
- We publish detailed information on taxation in our Annual Report and Accounts which are available on our website, and
- we adopt a responsible approach to tax matters, in accordance with our Tax Policy which is agreed with the Audit Committee and shared and discussed with HM Revenue & Customs (HMRC);

While we note your request to support a new international accounting standard on country by country reporting, we believe that the merits of such reporting, particularly in the manner suggested in your letter, need to be weighed against the administration burden of collecting and publishing this information; the relevance to stakeholders in understanding the stewardship of the company, and whether information in this form would make a sufficient incremental contribution to addressing the issues raised in your letter. Furthermore the information may be misleading, as taxable profits calculated, as required by laws of individual jurisdictions, are likely to be different than accounting profits calculated under international accounting standards.

The information that you set out in your letter is generally available to individual tax authorities worldwide and is of limited relevance to the vast majority of our stakeholders. There have been few if any demands from large shareholders to see such data. We believe that a better way to improve transparency is by helping developing countries improve the administrative capacity within their tax administration. Pearson plc, through its membership of The Hundred Group of Finance Directors, is actively engaged in this area.

Your letter makes reference to estimates by Christian Aid of uncollected taxes in the UK and developing countries. While we are unable to comment on the accuracy of these estimates, we would draw your attention to the analysis published in October by HMRC ("Measuring Tax Gaps 2012") which suggests that the tax gap attributable to large corporates is a much smaller number than the amount quoted in your letter.

Yours sincerely,



Robin Freestone
Chief Financial Officer



Stephen A M Hester
Group Chief Executive

4th December 2012

Stephen McPartland MP
House of Commons
London
SW1A 0AA



Gogarburn
Edinburgh
EH12 1HQ



www.rbs.com

Thank you for your recent letter regarding the campaign to promote corporate tax transparency. RBS takes the issue of corporate tax disclosure seriously, and as a company we, and our employees, contribute significant amounts to governments around the world through taxation.

Our annual tax payments in the UK are outlined in our Annual Report and Accounts and in our Sustainability Report. We recognise that a range of stakeholders have an interest in this, and work hard to understand their concerns. Earlier this year, for example, members of the RBS Board and senior executives who sit on our Group Sustainability Committee met with both Transparency International and the UK Tax Justice Network to discuss a range of issues, including transparency, low tax jurisdictions and the merits of country-by-country reporting.

While we continually review levels of disclosure, we believe that country-by-country reporting is of most value where companies are operating in developing nations which may have less sophisticated tax regimes. The RBS Group does not have significant operations in such countries and the vast majority of our cashflows come through well established jurisdictions, where we transparently meet all our local obligations regarding tax.

As a company, we were one of the first signatories to the UK voluntary Tax Code of Conduct ('the Code') and adhere to both the letter and spirit of the law. This includes our support of the commitment to being open and transparent in terms of our operations and taxation payments. The Group policy in this area is overseen by our Group Internal Tax department and is subject to external and internal audit. This department has extensive experience combined with a detailed knowledge of the business; it therefore has the knowledge and approach to ensure we comply with the Code. The Code is something we take seriously and view as part of our wider fiduciary responsibility to our shareholders.

I hope this helps answer your query. If you'd like to know more, we would be more than happy to arrange a meeting to discuss the issues further.

Erik Engstrom
Chief Executive Officer

19th December 2012

Mr Stephen McPartland MP
House of Commons
London
SW1A 0AA



Dear Mr McPartland

Thank you for your letter of 19th November.

I am pleased to confirm that Reed Elsevier supports tax transparency. This is demonstrated in the following ways:

- (i) we provide relevant financial information in full to the tax authorities in the jurisdictions in which we operate;
- (ii) we adopt a responsible approach to tax matters, in accordance with our Tax Policy which is reviewed and agreed with the Audit Committee and shared and discussed with HMRC;
- (iii) we publish detailed information on taxation in our Annual Report and Financial Statements which are available on our website; and
- (iv) we comment on taxation in our Corporate Responsibility Report which is also available on our website.

We believe that the merits of country by country reporting, particularly in the manner suggested in your letter, need to be weighed against the administration burden of collecting and publishing this information, the relevance to shareholders and other stakeholders in understanding the stewardship of the company, and whether information in this form would make a sufficient incremental contribution to addressing the issues raised in your letter.

Relevant financial information is available to tax authorities worldwide and efforts may be best focussed on applying the existing administrative rules on taxation in the most effective manner possible and in supporting capacity building in developing countries. Reed Elsevier is actively engaged with business organisations in the UK, such as the CBI and The Hundred Group of Finance Directors, as well as with the OECD, HMRC and HM Treasury in these areas. We note the Chancellor's recent announcement of additional resources for HMRC to investigate the tax affairs of companies which we fully support.

Your letter references estimates by Christian Aid of uncollected taxes in the UK and developing countries. We do not comment on the accuracy of these estimates other than to point to the analysis published in October by HMRC ("Measuring Tax Gaps 2012") which suggests that the gap attributable to large corporates is a small fraction of the amounts quoted. We believe this context is important for the proper discussion of these matters.

Yours sincerely



Erik Engstrom

Confidential

Mr Stephen McPartland
Member of Parliament for Stevenage
House of Commons
London
SW1A 0AA



23 November 2012

Dear Mr McPartland

Thank you for your letter dated 19 November 2012 which our Chief Executive has passed to me, and to which he has asked me to respond on his behalf.

As a FTSE 100 company we believe that we have a responsibility to our customers, suppliers, employees and local communities to provide disclosures that are relevant to our business and comply with regulatory and best practice guidance. We take our tax compliance responsibilities and our responsibilities to pay taxes due very seriously, both in the UK and in other territories in which we operate. We disclose the information we are required to disclose under current accounting standards and naturally we would ensure compliance with any new UK or relevant international accounting standards.

Yours sincerely

David Robbie
Finance Director

REXAM PLC
4 MILLBANK
LONDON SW1P 3XR

2 Eastbourne Terrace
London
W2 6LG

26 November 2012

Mr Stephen McPartland
Member of Parliament for Stevenage
House of Commons
London
SW1A 0AA



Dear Mr McPartland,

Re: Tax Justice Bus Tour

Thank you for your letter of 19 November about corporate tax transparency.

Rio Tinto is committed to providing transparency about tax payments made to governments, as part of our corporate commitment to sustainable development and good corporate governance. We have provided voluntary reporting of tax and wider economic contributions for a number of years. In 2010 we committed to increase the level of our detailed reporting on tax payments to governments. Our latest [report](#) (hard copy enclosed), which covers the year ended 31 December 2011, presents key data on tax payments, and shows our economic contribution to public finances.

Additional information on our operations such as revenue, EBITDA, assets, depreciation, net earnings and production volumes and reserves including selected information by reporting unit can also be found in our annual financial statements (for example, see pages 130-220 of our [2011 Annual Report](#)).

The extractives industries have been in the vanguard of tax transparency, given the importance of the revenues we generate for the countries in which we operate. The Extractives Industries Transparency Initiative, on whose Board my colleague Debra Valentine sits, has played an important role in this, and we have been strong supporters since its launch in 2003.

The performance of the sector was also evidenced by a recent Transparency International report on corporate reporting in which the Top 5 companies were all extractives; Rio Tinto was ranked second, after Statoil. Furthermore, the PwC Building Public Trust award recognised Rio Tinto for best tax reporting in the FTSE100 category, and specifically the most transparent disclosure of tax strategy, tax performance and the wider impact of tax.

On your question regarding an international accounting standard, you will no doubt also be aware of recent US legislation under the Dodd-Frank Act, and forthcoming EU legislation directed at the extractives industry. We believe that this is likely to provide a fully adequate regulatory basis to promote transparency in this sector. We hope to see similar requirements rolled out in other jurisdictions to create a global level playing field for the extractives industries.

Given the significant financial reporting disclosure that we already make, and the detailed information that we already provide to the tax authorities in the countries where we operate, we do not believe that an additional international accounting standard is needed. The data that you list for a particular country, together with a schedule of any related party transactions, could be, and often is, routinely requested by a tax authority as part of the tax return. In our view, this is the most practical way for tax authorities to identify those transactions that require further review to check that the transfer prices used meet the OECD's arm's length standard. My tax experts would be happy to give you more details on how this works in practice.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Tom Albanese', with a long horizontal flourish extending to the left.

Tom Albanese

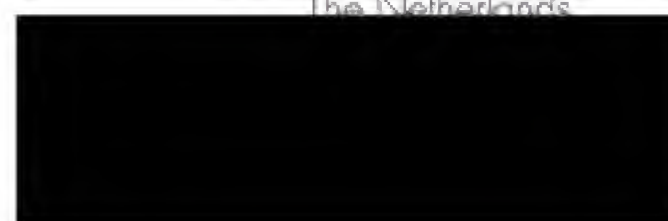


Royal Dutch Shell plc

Stephen McPartland MP
House of Commons
London
SW1A 0AA



Carel van Bylandtlaan 30
2596 HR The Hague
The Netherlands



Friday 30th November 2012,

Dear Mr McPartland,

Many thanks for your letter addressed to Mr Voser on the subject of corporate tax transparency. I would like to take the opportunity to provide some further insights on our position with regard to revenue transparency.

Shell is a founder and board member of the Extractive Industries Transparency Initiative (EITI), a global initiative launched by the UK government in 2002 to increase transparency in revenues that governments receive from oil and mineral activities. EITI's approach brings together governments, civil society, and companies and we believe it remains the most effective way of promoting improved transparency in government revenues. In fact, we were the first company to publish in 2003 the royalties, taxes and other payments made to the Nigerian government, with their permission and support.

We have also expressed our support for a mandatory global reporting standard for extractive industries in line with the current EITI requirements. To reinforce our commitment, in April of 2012 we, voluntarily, decided to publish details of the payments we make to governments of some of the main countries where we operate.

In 2011, Shell paid globally \$22.6 billion in corporate taxes and \$4.4 billion in royalties. Furthermore, we collected some \$88 billion in excise duties and sales taxes on behalf of governments. I have attached a copy of the revenue transparency disclosure over 2011 which is available on our company's website. The information provided is consistent with that used to prepare our Consolidated Financial Statements which form part of the 2011 Annual Report. The Annual Report provides further financial data on revenues, investments, assets and indeed taxation charges for the company as a whole with, in certain cases, information by geographical area.

As you will know new regulations on revenue transparency are being introduced or in preparation both in the U.S. and in Europe which is, not surprisingly, attracting significant interest from various stakeholder groups. One development we observe is an ever increasing demand for more detailed information including project or asset specific disclosures.

Typically, the majority of tax payments in extractive industries are levied at a corporate level and requirements to disclose lower level information would demand, at times arbitrary, allocations. In my view this would not result in meaningful additional disclosures or information that would serve to promote transparency and I would therefore question the effectiveness of such proposals.

In addition, there will likely be circumstances where individual or selective disclosure involves commercially sensitive information which would harm the competitive position of companies subject to UK and/or European legislation. Indeed, in certain countries it may actually be illegal to disclose sensitive data such as oil and gas reserves and revenues. In those circumstances the proposed EU legislation could place companies in breach of contract as well as in the position of having to choose which law to break.

In summary, we support a common international standard for all companies engaged in extractive activities which delivers meaningful data to local communities and relevant stakeholders. We believe the current EITI requirements, which call for country by country disclosures, provide an effective means to support the overall goal of stronger governance of and improved accountability for public revenues and how such funds are appropriated.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Henry', with a stylized flourish at the end.

Simon Henry
Chief Financial Officer
Royal Dutch Shell plc

Sainsbury's



official partner of the Paralympic Games

Stephen McPartland MP
House of Commons
London
SW1A 0AA



Justin King CBE
Group Chief Executive

Sainsbury's Supermarkets Ltd
33 Holborn
London
EC1N 2HT

Tuesday 27th November 2012

Dear Mr McPartland,

Thank you for your letter dated 19th November concerning corporate tax transparency.

Sainsbury's is a domestic, UK based company and we therefore pay our corporation tax here in the UK. We provide information about our corporate tax in our annual accounts which are available on our website.

In a 2011 study by Price Waterhouse Coopers, we were ranked the 11th highest UK tax payer in terms of total tax contribution. In the year to March 2012, we paid £82,000,000 in corporation tax.

We are not an international company so all of our trading profit is subject to corporate tax in the UK, unlike international companies. However, rather than developing a new international accountancy standard, which will take a long time, I strongly believe that consumers are best placed to encourage companies to pay a fair amount of tax in the UK. Consumers can elect which companies they shop with and, if they don't believe a company is fairly contributing to society, can vote with their wallet. This is the quickest and most powerful way in which to encourage a business to change their practices.

I hope this reassures you of our commitment to being a responsible retailer and making a positive difference to the UK, and the communities in which we serve.

Yours sincerely,

Justin King

Registered office as above
Registered number 3261722 England
A subsidiary of J Sainsbury plc

Kevin Parry
Chief Financial Officer

11 December 2012



Mr Stephen McPartland, MP
House of Commons
London
SW1A 0AA

Dear Mr McPartland

Tax Justice Bus Tour

Thank you for your letter of 19 November to Michael Dobson.

We are very happy to participate in the current dialogue about tax transparency. For example, our Group Head of Tax and Head of Responsible Investment recently met representatives of Christian Aid to discuss these matters.

Schroders is committed to conducting its tax affairs in an open and transparent way. Our tax strategy contains an undertaking that we will comply with our tax obligations worldwide and will maintain a good reputation with tax authorities in the key jurisdictions in which we operate. In the UK, Schroders was one of the first businesses to enter into a framework agreement with HMRC under which we undertook to disclose significant compliance issues, risk and uncertain tax positions or anomalies. We continue to conduct our tax affairs on those principles. We have also signed up to the Code of Practice on Taxation for Banks and comply with its requirements.

However, we have reservations about a new accounting standard along the lines you suggest, requiring the reporting of financial information on a country by country basis. Financial reporting is already complex and detailed and we support the Financial Reporting Council's initiative to "declutter" reports and accounts so as to aid reading and understanding. A new standard would be counter to those important principles and could be perceived to be a very heavy handed approach to the strong arguments that are being successfully communicated by Christian Aid and other leading charities.

Yours sincerely





Serco Group plc
Serco House
16 Bartley Wood Business Park
Bartley Way
Hook
Hampshire RG27 9UY
United Kingdom

Mr Stephen McPartland MP
House of Commons
London
SW1A 0AA

31 December 2012

Dear Mr McPartland

Thank you for your recent letter to Chris Hyman. He has asked me to respond on his behalf.

Your letter is about a very important subject and I would initially like to make clear that as a business Serco does not engage in tax avoidance activities, we fully comply with tax laws and regulations and we fully support corporate tax transparency.

Serco is an international business, listed on the London Stock Exchange and with our Group headquarters at Hook in Hampshire. We provide services for customers in many countries around the world and pay tax wherever we deliver these services in accordance with the local laws and regulations. These are all fully disclosed to HM Revenue & Customs.

We believe that companies should be open with the authorities about their financial performance and tax position, on a country by country basis. For example, we disclose audited financial statements on a country by country basis, for all of our subsidiaries, showing financial performance, tax liability, the cost and net book value of fixed assets and details of gross and net assets. We fully and happily comply with all relevant legislation and would be keen to understand in more detail what is proposed over and above these current requirements.

I hope that you find this response helpful.

Yours sincerely

John Hickey
Company Secretary
Serco Group plc



Severn Trent Plc

Severn Trent Centre
PO Box 5309
Coventry
CV3 9FH

www.severntrent.com

Stephen McPartland
Member of Parliament for
Stevenage
House of Commons
London
SW1A 0AA



29 November 2012

Dear Mr McPartland

Thank you for your letter dated 19 November 2012 about tax issues.

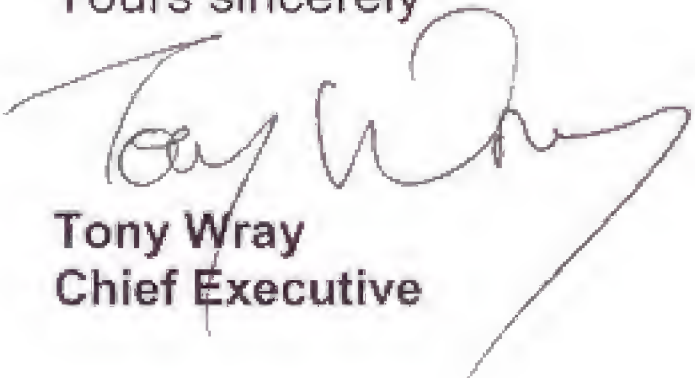
As a FTSE 100 company, we take our tax paying obligations seriously, not just in the context of Corporation Tax but also across the number of other business taxes that we pay. Together, these taxes amounted to £165.5m for the year ended 31 March 2012. We also collected a further 44.1m of employment taxes on behalf of the Exchequer. Further details can be found on our website.

Internationally, we always seek to ensure that we fully comply with the rules and standards laid down in each of the territories in which we operate. We work hard to ensure that our financial reports contain a clear statement of the taxes charged and, as a listed group, we provide the market with twice yearly forecasts of our underlying effective tax rate.

We comply with all financial reporting requirements imposed by the Financial Reporting Council in the UK and relevant bodies in other countries in which we operate. We also respect our engagements including those engagements of confidentiality with revenue authorities. Of course should these authorities change their requirements then we will meet these obligations in full.

Should you require any further information on the contribution we make to the UK economy or, more generally, our general economic footprint, please contact Paul Evans at [REDACTED]

Yours sincerely


Tony Wray
Chief Executive



Stephen McPartland MP
House of Commons
London SW1A 0AA



23rd November 2012

Dear Stephen,

Re: Corporate Tax Transparency

Thank you for your letter to Jeremy Darroch concerning international corporate tax transparency, Jeremy has asked me to respond.

I should point out that, unlike many FTSE 100 companies, the vast majority of Sky's business takes place in the UK, and we do not operate in developing countries. Our activities are therefore currently subject almost entirely to UK taxes and we are fully transparent about the taxes that we pay and collect.

In 2011/2012, Sky directly contributed a total of £1.1 billion to the Exchequer. Of this, £382 million were receipts we paid directly, including corporation taxes and employer NI contributions. We also collected a total of £755 million in taxes on behalf of HMRC through customers' VAT payments and staff's labour taxes. In the last five years, Sky has contributed £4.4 billion in taxes to the Exchequer including corporation tax, NI, VAT and labour taxes.

Evidence for the scale of our contribution can be found in the 2011 PWC survey of the Total Tax Contribution of the 100 leading UK companies where Sky came top in our sector and sixteenth overall (compared with our market capitalisation of 36th in the FTSE 100).

We are proud of the contribution that we make to the UK economy, including the direct employment of nearly 23,000 people in this country. We are also increasing our investment in the UK, especially in the creative industries, with a commitment to increase our spending on original UK production to £600 million a year by 2014, which will represent more than 50 per cent growth over three years.

We are fully committed to transparency in the way in which we conduct our business right across the board, including the way in which we report payment of taxes. You can find further information on our reporting and our on contribution here: http://corporate.sky.com/the_bigger_picture.

Please let me know if I can be of further assistance.

Yours sincerely,

David Wheeldon
Director of Policy and Public Affairs
BSkyB Ltd



smiths

bringing technology to life

Smiths Group plc
2nd Floor, Cardinal Place,
80 Victoria Street,
London SW1E 5JL, UK

www.smiths.com

14th December 2012

Stephen McPartland MP
House of Commons
London SW1A 0AA



Dear Mr McPartland,

Thank you for your letter of 19 November to Philip Bowman, in which you raise concerns expressed by Christian Aid supporters in Stevenage about corporate tax transparency. I am pleased to reply on behalf of Smiths Group plc.

Smiths Group is a global technology business that serves a diverse range of customers across the healthcare, energy, telecommunications, transportation and security sectors. We employ some 23,000 people in more than 50 countries around the world.

We abide by the Smiths Group Code of Business Ethics, which sets out the key principles by which we do business, based on the values of integrity, honesty, fairness and transparency. These principles include complying with the law; competing fairly; acting with integrity in all our business dealings; respecting the environment; contributing to our communities; and maintaining high standards of financial record-keeping and reporting.

Smiths Group's Annual Report 2012 is perhaps the most useful source of detailed information on the importance we attach to meeting our corporate responsibility and accounting reporting requirements. I am taking the liberty of enclosing a copy of the report; it is also available to browse and download at www.smiths.com. Our full Code of Business Ethics can be found at page 59 of the Report, as part of a wider section devoted to Corporate Responsibility which notes Smiths Group's continued membership of the FTSE4Good Index for having met globally recognised corporate responsibility standards.

We fully support, and comply with, existing transparency and disclosure requirements as mandated by the UK and international authorities: as page 96 of the Report sets out, the accounts have been prepared in accordance with the Companies Act 2006 applicable to companies reporting under International Financial Reporting Standards (IFRS).

The Annual Report makes clear our commitment to managing our relationships with tax authorities in the jurisdictions in which we operate on the basis of full disclosure, co-operation and legal compliance. As a global business, we do so in a responsible manner in order to enhance our competitive position, and we follow closely the development and application of international transparency standards.

I understand that you intend to publish the responses you receive to your letter. I have, for the record, no objection to you doing so.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Andrew Lappin', with a stylized flourish at the end.

Andrew Lappin
Director, Government Relations

From [redacted] <mailto:[redacted]>
[mailto:[redacted]]
Sent: 20 November 2012 16:47
To: MCPARTLAND, Stephen
Subject: Tax Justice Bus Tour letter

Dear Mr McPartland

Re: Tax Justice Bus Tour

Thank you for your letter of 19 November. SSE's position on tax is as set out on page 23 of its Annual Report 2012, reproduced below for ease. I hope this addresses key issues raised by the Tax Justice Bus tour. Please let me know if you need any more information on this or any other aspect of the energy industry.

Being a responsible tax payer (page 23)

Central to SSE's approach to tax is that it should be regarded as a responsible tax payer. As a consequence, SSE maintains a good relationship with HM Revenue & Customs, based on trust and cooperation.

SSE strives to manage efficiently its total tax liability, and this is achieved through operating within the framework of legislative reliefs. SSE does not take an aggressive stance in its interpretation of tax legislation, or use so-called 'tax havens' as a means of reducing its tax liability. SSE's tax policy is to operate within both the letter and spirit of the law at all times.

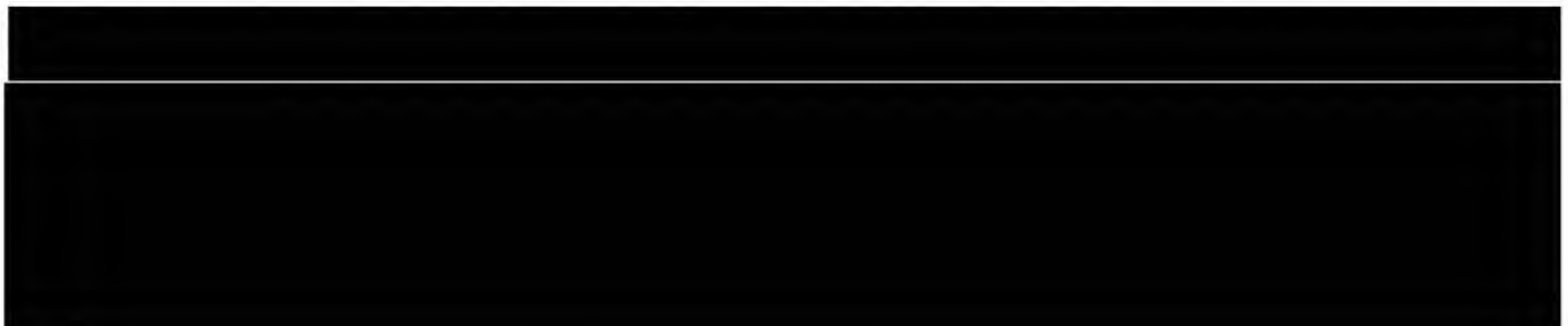
SSE's tax paid to the Government in the UK, including Corporation Tax, Employers' National Insurance Contributions and Business Rates, totalled £396.4m during the year to 31 March 2012, compared with £343.8m in the previous year. SSE also pays taxes in the Republic of Ireland, in relation to its operations there, and indirectly contributed £59.5m to UK government tax revenues through its significant investment in joint ventures and associates (as compared with £69.9m in the previous year).

As a member of the Hundred Group of Finance Directors, SSE contributes to its annual Total Tax Contribution survey. SSE ranked 23rd in the 2011 survey, both in terms of tax paid and total tax contribution.

Regards,

Alistair McGirr
Public Affairs

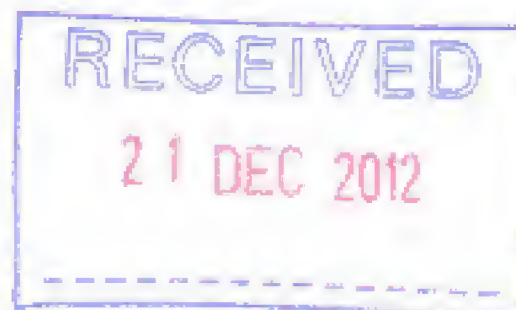
SSE | Warwick House, 25 Buckingham Palace Road, London, SW1W 0PP



David Nish
Chief Executive

Standard Life plc
Standard Life House
30 Lothian Road
Edinburgh EH1 2DH

Mr Stephen McPartland MP
House of Commons
London
SW1A 0AA



17 December 2012

Dear Mr McPartland

Re: Tax Justice Bus Tour

Thank you for your letter of 19 November regarding the above.

At Standard Life we take our tax responsibilities very seriously and we support moves to tackle artificial and abusive tax avoidance arrangements. As part of this, we also take our financial reporting responsibilities seriously and ensure that we fully comply with the relevant international accounting standards relating to tax disclosures. You will be aware that our financial reports and related disclosures are already the subject of independent audit to ensure full compliance.

Evidently this is a complex area. Careful consideration is needed before international accounting standards are changed. There needs to be a period of well managed and extensive consultation to ensure that proposals are well thought through and do not introduce additional problems, for example conflicts with territory specific laws and regulations. In addition policymakers must be careful to ensure that any reforms serve to present information in a way that is genuinely meaningful and helpful.

Changing international accounting standards as suggested, however, may not necessarily be the most effective way to help developing countries secure tax revenues. Other measures such as training and assistance with developing their tax administration systems to enable them to better tackle tax avoidance may be more effective in the long term.

I understand that the 100 Hundred Group will be writing separately to you on this matter. We have seen that letter and support the views expressed. Standard Life would welcome taking part in further consultations on this important area.

Yours sincerely

A handwritten signature in blue ink, appearing to be "D Nish", written over a horizontal line.

David Nish

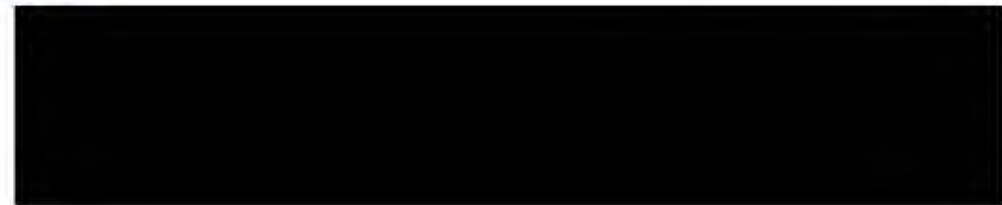


22 November 2012

Stephen McPartland MP
House of Commons
London
SW1A 0AA



Tesco Stores Limited
Corporate & Legal Affairs
New Tesco House
Delamare Road
Cheshunt
Herts EN8 9SL



Dear Mr. McPartland

Thank you for your letter of 19 November to Philip Clarke about our corporate tax transparency.

As one of the largest payers of tax in the UK we take our responsibilities on tax very seriously and are committed to supporting tax transparency. We do this through an open relationship with HMRC and other tax authorities. We also publish a detailed annual financial report, available on our website, which you can find here:
<http://www.tescopl.com/index.asp?pageid=29>.

However, this is a complex area and to provide the details you are requesting would need careful consideration to ensure that any disclosure was useful for our stakeholders. Therefore, we would need to consider the detail of the proposal to be able to comment on whether it was something that we would support.

Please let me know if I can be of any further help, or assist you with any other matter relating to Tesco.

Victoria McKenzie-Gould
Head of Government Affairs

Tullow Oil plc

6, Chiswick Park, 566 Chiswick High Road, London, W4 5YT



Stephen McPartland, MP
House of Commons
London
SW1A 0AA



Dear Mr. McPartland,

Thank you for your letter of 19 November 2012 which was sent to our CEO, Aidan Heavey, and has been passed to me for answer.

Tullow Oil supports wholeheartedly transparency and responsible conduct, including the correct and timely payment of taxes, across the business sector and details considerable financial information in its annual report and corporate responsibility report. For example, our 2011 annual report stated that Tullow paid an effective tax rate on profits made across the Group of 35.8%. In addition, we pay all other local taxes including import taxes, royalties, VAT, employers' taxes and other duties required of us in compliance with local country laws and regulations.

As a resources company operating mostly in Africa, Tullow has a particular responsibility to be as transparent as possible and we have signed up to the Extractive Industry Transparency Initiative (EITI) in many of the countries in which we operate. In Ghana, for example, which is our major country of operation in Africa, we publish our contracts with and payments to government clearly on our Group website and it is our hope that all the countries in which we work will sign up to EITI in due course.

EITI has been a vital initiative for our sector and the clear direction of travel for oil and gas and mining companies operating in developing countries is for further transparency. The Dodd's Frank Act in the US, further suggestions from EITI and, more relevant to Tullow, the EU's proposed amendments to the Transparency Directive will all affect how resources companies report their payments and interactions in the countries in which they operate. Therefore, given these existing initiatives and the momentum being created around them, your suggestion of a new international accountancy standard would, for a company in Tullow's sector and areas of operation, seem unnecessary at the moment.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Ian Springett".

Ian Springett
CFO
Tullow Oil Plc

Andy Halford BA FCA
Group Chief Financial Officer



4 December 2012

Stephen McPartland
Member of Parliament for Stevenage
House of Commons
London
SW1A 0AA

Dear Mr McPartland

Tax Justice Bus Tour

Thank you for your letter of 19 November addressed to Vittorio Colao.

As I am sure you will appreciate, Vodafone takes its corporate responsibility extremely seriously and is committed to acting with integrity and transparency in all tax matters. We paid around £2.3bn in corporate taxes across more than 20 countries last year at an effective tax rate of 25.3%, so for every £4 we make in profits we pay £1 in corporate taxes.

Whilst we fully support the ultimate aims of Christian Aid in improving development and building capacity in emerging markets, and seek to play our part in that development whether through the building of telecommunications infrastructure, through the charitable work of the Vodafone Foundation, through direct and indirect employment and wealth creation or through all due tax contributions, we do not believe that 'country by country' reporting will assist in achieving those aims.

Unfortunately the numbers quoted by Christian Aid and other organisations lack a degree of credibility, for example by taking no account of the impact of governments granting reliefs and allowances for investment in infrastructure, research and development, in special economic zones or areas of deprivation and so on. Indeed HMRC's latest estimates of the 'tax gap' in the UK from businesses dealt with by their Large Business Service amounts to £1.4bn¹ not the £35bn of 'tax dodging' quoted.

We comply fully with all our obligations to pay the amount of tax legally due and to observe all applicable rules and regulations in each of the territories in which we operate and we meet international accounting standards in full in all our tax disclosures. We also have a full and open relationship with all relevant tax authorities which helps them to support Governments in the delivery

Vodafone Group Plc

One Kingdom Street
Raddington Central, London W2 6BX, England

Web: www.vodafone.com

Registered Office: Vodafone House, The Connection, Newbury, Berkshire, RG14 2FN Registered in England No. 1833679



of the infrastructure and public services to which you refer. Through both our annual financial statements and our sustainability reports, we aim to enable other stakeholders to understand both our tax strategy and the impacts on our business and stakeholders.

http://www.vodafone.com/content/index/investors/investor_information/financial_results.html

http://www.vodafone.com/content/index/about/sustainability/sustainability_report/issue_by_issue/tax.html

Indeed the transparency in our tax reporting has been independently recognised through the Building Public Trust Awards for tax reporting, which we have twice won in the past five years, have been highly commended once and have again been shortlisted for this year's award.

Unfortunately a move to country by country disclosure would fill our Annual Report with more than 600 different reporting segments – at least 20 pieces of additional tax information per country in which we operate. This would be a vast increase in micro-level reported data which would be of questionable value to our shareholders.

Such disclosures would also do little to provide a fuller picture of Vodafone's role in the societies within which it operates - the question which lies at the heart of all those calling for country-by-country reporting - and would make no difference to the transparency with which we engage the tax authorities around the globe. Our contribution, in terms of inward investment, large-scale employment, skills development and support for innovation and social and economic development, is significantly broader than the narrow question of corporate taxation. More comprehensive information about our contribution to development in emerging markets is available on our website at www.vodafone.com.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Andy Halford", with a long horizontal line extending to the right.

Andy Halford

¹<http://www.hmrc.gov.uk/stats/mtq-2012.pdf>



Mr Stephen McPartland MP
House of Commons
LONDON
SW1A 0AA

17 December 2012



Dear Mr McPartland

RE: Tax Justice Bus Tour

Thank you for your letter of 19 November regarding Christian Aid's Tax Justice Bus tour.

We of course support the principle of corporate tax transparency. We also feel that the disclosures and mechanisms applied in pursuit of this principle should be developed after an informed consultation process, followed by consistent application across all multi-national businesses. This would clearly need to encompass those corporations that are not subject to International Financial Reporting Standards in order that an unfair regime is avoided.

This would be the best way to meet the needs of stakeholders in the debate around tax transparency and fairness and avoids a piecemeal process where individual companies or countries adopt their own approaches. This would serve nobody's interests and risks adding further confusion around an issue which can often be highly complex.

Yours sincerely

A handwritten signature in black ink, appearing to read "Keith Cochrane".

Keith Cochrane
Chief Executive

29th November 2012

S McPartland MP
House of Commons
London
SW1A 0AA



Dear Mr McPartland

Tax Transparency

Thank you for your letter of 19th November to Andy Harrison our CEO.

We do support tax transparency by complying with the relevant laws and disclosure requirements of the UK and other countries where we carry on business. We would not support imposing further accounting standards in this area as this would impose unnecessary burdens and complexity in reporting and will not solve the issue we understand it aims to address. Imposing unnecessary regulations on all companies, the vast majority of which follow the letter and spirit of legislation, to highlight the few is not appropriate or fair.

Yours sincerely

Simon Barratt
General Counsel

7 December 2012

Mr Stephen McPartland MP
Member of Parliament for Stevenage
House of Commons
London
SW1A 0AA



Dear Mr McPartland,

Thank you for your letter of 19 November 2012.

Wolseley is committed to the highest standards of corporate governance and compliance and these matters have the close attention of the management and board of the Group.

All companies within our group prepare financial statements in accordance with applicable accounting standards; they are audited in accordance with legislation and filed promptly with all relevant authorities. We also try to set out the financial performance of our businesses in a way that helps regulators, shareholders, creditors, customers and staff to understand the performance of the businesses in which they have a stake and the governance principles adopted.

Within the United Kingdom, the financial statements of each Company within our Group are promptly filed with Companies House and are publicly available. For every single company they include the financial performance, the tax charge, the tax liability, an analysis of the book value of all assets and liabilities, an analysis of the corporate tax charge including movements in current and deferred taxes, a reconciliation to the headline tax rate and the cash tax paid as well as a full audited profit and loss account, balance sheet, cash flow statement and notes. These requirements, set out within the Companies Act, applicable accounting and auditing standards, and various corporate governance sources, are unique within the countries in which we operate and, to our knowledge, provide the most comprehensive access to company results anywhere in the world.

Kind regards,

Ian Meakins
Chief Executive